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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL THE
DECLARATION OF PIERRE-YVES
DROZ IN RESPONSE TO THE COURT'S
QUESTION REGARDING WAYMO'S
ASSERTED TRADE SECRET #1 AND
EXHIBITS THERETO**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal the Declaration of Pierre-Yves Droz in Response to the Court’s Question Regarding Waymo’s
8 Asserted Trade Secret #1 and Exhibits Thereto (the “Administrative Motion”). The Administrative
9 Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Declaration of Pierre-Yves Droz in Response to the Court’s Question Regarding Waymo’s Asserted Trade Secret #1 (“Droz Declaration”)	Entire Document	Waymo
Exhibits J-L to Droz Declaration	Entire Documents	Waymo

15 3. The Droz Declaration and exhibits thereto contain references to Waymo’s trade secret
16 information, which Waymo seeks to seal. The references describe Waymo trade secrets with
17 specificity, including their description, development, and implementation.

18 4. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 24-15)
19 and are valuable as trade secrets to Waymo’s business (Dkt. 24-3). The public disclosure of this
20 information would give Waymo’s competitors access to descriptions of the functionality of Waymo’s
21 autonomous vehicle system. If such information were made public, I understand that Waymo’s
22 competitive standing would be significantly harmed.

23 5. Waymo’s request to seal is narrowly tailored to materials that merit sealing, and
24 Waymo’s request to seal is consistent with other administrative motions to seal that have already been
25 granted by the Court in this case. (See Dkt. 416, 414, 406, 393, 392.)
26
27
28

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct, and that this declaration was executed in San Francisco, California, on May 17, 2017.

3 By /s/ Lindsay Cooper

4 Lindsay Cooper

5 Attorneys for WAYMO LLC

6 **SIGNATURE ATTESTATION**

7 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
8 filing of this document has been obtained from Lindsay Cooper.

9
10 /s/ Charles K. Verhoeven

11 Charles K. Verhoeven